

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	Robert Khan,	:	Chapter 13
	Debtor	:	Bankruptcy No. 23-10531-PMM

**DEBTOR’S MOTION TO REINSTATE BANKRUPTCY PROCEEDING AND
REIMPOSE THE AUTOMATIC STAY**

Robert Khan, by and through his attorney, Brenna H. Mendelsohn, Esquire, files this Motion to Reinstate Bankruptcy Proceeding and Reimpose the Automatic Stay and in support thereof, represents the following:

1. Movant, Robert Kahn, is the Debtor in the above-captioned bankruptcy proceeding.
2. On February 24, 2023, the Debtor filed a Voluntary Petition under Chapter 13 of the United States Bankruptcy Code, said Petition being docketed to No. 23-10531-PMM in the United States Bankruptcy Court for the Eastern District of Pennsylvania.
3. The Debtor’s Chapter 13 Plan was confirmed with this Honorable Court on August 31, 2022.
4. A Motion to Dismiss Case for Failure to make monthly Plan Payments was filed on January 10, 2024.
5. Debtor was unable to catch up in full prior to the hearing date of February 8, 2024.
6. An Order dismissing the case without prejudice was signed on February 8, 2024.
7. Debtor avers that he now has the funds to catch up his plan payments in full and continue with monthly payments going forward. Debtor will be fully current by

the hearing date.

8. Debtor requests that the instant bankruptcy proceeding be reinstated and the automatic stay reinstated for the purposes set forth herein. .

WHEREFORE, The Debtor prays that this Honorable Court enter an Order reinstating the instant Chapter 13 case, reimposing the Automatic Stay and vacating the dismissal Order dated February 8, 2024.

DATED: February 12, 2024

Respectfully submitted,

/s/ Brenna H. Mendelsohn

Brenna H. Mendelsohn, Esquire
Attorney for Movant